

MEMO ENDORSED

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April 8, 2024

Hon. Victoria Reznik
U.S. Magistrate Judge
Southern District of New York
300 Quarropas St.
White Plains, NY 10601-4150

**Re: *The Wave Studio, LLC v. General Hotel Management Ltd., et al.*,
Case No. 7-13-cv-09239-CS-VR; Plaintiff's Letter**

Dear Judge Reznik:

We represent Plaintiff The Wave Studio, LLC in this action and write to provide an update on the status of the tasks outlined in Your Honor's March 1, 2024, Minute Order (the "Order") and to request a brief extension to produce infringement evidence.

Wave has worked quickly over the last month to produce thousands of pages of documents pursuant to the Order, including (1) evidence of the alleged infringement for the "Display-Only" Defendants, (2) Wave's entire library of photographs, (3) a native version of each of the almost 1,500 pdf spreadsheets attached to the Master Complaint, and (4) excerpts of the Singapore settlement agreement.

On March 8, 2024, Wave informed the Court that it could produce evidence of the infringement for the remaining Defendants (*i.e.*, those *not* in the "Display-Only" Category) by April 5, 2024. *See* ECF No. 351. Wave is working diligently to collect, organize, bates-label and prepare almost 200 GB of infringement evidence for production, but needs more time to complete this task. After consultation with our e-discovery group, Wave believes that it needs two additional weeks – until April 19, 2024 – to produce the evidence of the infringement for the remaining Defendants.

Wave respectfully requests that the Court grant Wave until April 19, 2024, to produce the evidence of infringement in Wave's possession to the remaining Defendants. Similar extensions have been granted to certain Defendants to produce information regarding the extent of their insurance coverage. Moreover,

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there is no prejudice given that the remaining Defendants will likely have the infringement evidence well before settlement discussions take place.

Respectfully Submitted,
Gabriel Berg
Gabriel Berg
Partner

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Plaintiff's request for an extension of time to produce evidence of infringement in Wave's possession to the Non-Display-Only Defendants is **GRANTED**. Wave shall produce such evidence by no later than **April 19, 2024**.

APPLICATION GRANTED


Hon. Victoria Reznik, U.S.M.J.

Dated: April 9, 2024